

ARIZONA WIRELESS & RADIO CO.

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November 3, 1995

Mr. William Caton, Secretary
Federal Communications Commission
1919 "M" Street, Room 222
Washington, D.C. 20554

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Dear Mr. Caton:

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Please accept for filing, one (1) original and four (4) copies of the attached Petition to Amend the FM Table of Assignments (part 73.202 (b) of the Commission's rules).

Should you have any questions or problems, please call me at the above phone number.

Thank you for your attention to this matter.

Sincerely,



Walter E. Raabe

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Before the
Federal Communications Commission
Washington D.C. 20554

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In the Matter of)
)
Amendment of Section 73.202(b),)
FM Broadcast Table of Assignments,)
Winslow and Doney Park, Arizona)
_____)

File No. _____

DOCKET FILE COPY ORIGINAL

PETITION TO AMEND FM TABLE OF ASSIGNMENTS

The petitioner, Arizona Wireless & Radio Co., an Arizona partnership, respectfully petitions the Commission to amend Part 73.202(b) of its Rules and Regulations, commonly known as the FM Table of Assignments, as follows:

1. Move existing unused Channel 236 (95.1 MHz.), presently assigned to Winslow, Arizona, from Winslow to Doney Park, Arizona, thereby creating Doney Park's first broadcast channel assignment.

2. Replace Channel 236 at Winslow, Arizona with Channel 292 (106.3 MHz.).

SUPPORTING ARGUMENTS

The Petitioner demonstrates herein that the "public interest, convenience and necessity" would be served by the Commission's grant of this petition for the requested allocations:

1. The removal of Channel 236 (95.1 MHz.) from Winslow, Arizona would allow the frequency to be assigned to Doney Park, Arizona making it Doney Park's first broadcast frequency allocation. Doney Park is located 50 miles west of Winslow, closer to several new allocations at Flagstaff, Kingman, Prescott, Payson, and along the Arizona-California border, which now restrict allocations in the Doney Park area. Winslow, isolated and located to the east, happens to be located more than the required distance for many of the first, second and third adjacent channels of the above-mentioned newer allocations. Therefore it has been found that Channel 292 (106.3 MHz.) can be assigned to Winslow as a Class C2 assignment in order to replace Channel 236. By placing a transmitter site 8 miles north of Winslow, a Class C1 allocation could be achieved. However, the proposed Class C2 assignment would actually be more practical for Winslow than the existing Class C assignment as explained in paragraph 2 below.

2. Channel 236C was assigned to Winslow, Arizona in September, 1962 by the Commission. During the past 33 years the frequency has never been used. Several applications have been filed by various applicants, but each time the Commission has ultimately canceled their construction permits after no

construction occurred. Winslow does not have a strong economic base and a viable business sector, which would provide support for the costs involved in building and operating a Class C FM station. Winslow has seen little population growth over the last ten years and still has approximately 10,000 persons.

A brand new K-Mart was built in Winslow a few years ago, but has since closed due to lack of economic activity. The major employer in Winslow is the Arizona State Prison. There are no major population centers in the vicinity of Winslow. A Class C2 allocation at Winslow would eliminate the hefty Class C minimum requirement of a 984-foot antenna HAAT (over relatively flat desert terrain) and a 100 kilowatt transmitter plant and power bill. The Class C2 station would be much less expensive to build and operate in the depressed economic environment of Winslow, Arizona and would have a better chance of surviving.

3. Presently there is another application pending for Channel 236 at Winslow, but no permit or license has been granted (See BPH 941220MC). The applicant could be granted a construction permit for Channel 292 in lieu of Channel 236, should the Commission grant this petition.

4. Doney Park, Arizona is located near Flagstaff, Arizona and has experienced explosive growth over the last two years.

Many businesses and homes are presently under construction and Arizona Department of Commerce data and projections show that the area is one of the fastest growing areas in Arizona.

A proposed station located at the designated transmitter site, which would allow the required signal strength over Doney Park, would also effectively reach approximately 300,000 persons in Coconino, Navajo and Yavapai Counties. Doney Park is located adjacent to, and east of Flagstaff, the county seat of Coconino County. It is the only major commerce and trade area in Northern Arizona, and is the home of Northern Arizona University. Each year, several million travelers bound for Grand Canyon National Park and Sedona, pass through the area on Interstate 40. Hence, there is plenty of economic activity and population growth in the area to support a Class C station operating on the proposed allocation at Doney Park.

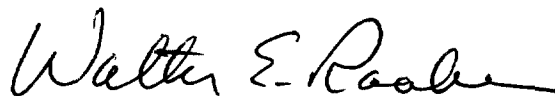
5. A complete engineering study has been completed for both frequency allocations and are attached hereto as exhibits. A map of Arizona has also been provided for the Commission's convenience.

6. The petitioner, Arizona Wireless and Radio Co., desires and intends to apply for a construction permit to build a new station to operate on the new proposed allocation at Doney Park, Arizona, should the Commission grant this petition.

Thank you for your consideration of these two
proposed frequency assignments and the amendment of F.C.C.

Rule 73.202(b).

Dated: November 3, 1995

A handwritten signature in cursive script, reading "Walter E. Raabe", is written over a horizontal line.

Walter E. Raabe
Arizona Wireless & Radio Co.
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Flagstaff, Arizona 86004-8740

Phone: (520) 526-6000

DISTANCES FROM PROPOSED FREQUENCY ALLOCATION AT DONEY PARK, ARIZONA
CHANNEL 236 - 95.1 MHZ - CLASS C

REFERENCE POINT @ 35° 16' 37" N., 111° 30' 49" W. (DONEY PARK COMMUNITY OFFICES)

CHANNEL # FREQUENCY	CHANNEL SEPARATION	STATION STATUS	STATION CLASS	CITY OF LICENSE	STATE	N. LATITUDE W. LONGITUDE	** REQUIRED SPACING (KM)	DISTANCE TO STATION (KM)	AZMUTH (DEGREES)
233 94.5 mHz	-600 kHz	KOOL LICENSE	C	PHOENIX	AZ	33° 20' 02" 112° 03' 42"	105 KM	221.3 KM	193.2°
233 94.5 mHz	-600 kHz	KKOR LICENSE	C	GALLUP	NM	35° 28' 03" 108° 14' 25"	105 KM	298.2 KM	85.9°
234 94.7 mHz	-400 kHz	KZZZ LICENSE	C	KINGMAN	AZ	35° 06' 40" 113° 53' 08"	105 KM	216.8 KM	265.1°
235 94.9 mHz	-200 kHz	KMXZ LICENSE	C	TUCSON	AZ	32° 14' 56" 111° 06' 59"	241 KM	337.8 KM	173.7°
235 94.9 mHz	-200 kHz	KBRE LICENSE	C1	CEDAR CITY	UT	37° 45' 51" 113° 06' 15"	209 KM	310.5 KM	332.7°
235 94.9 mHz	-200 kHz	KWYK LICENSE	C1	AZTEC	NM	36° 41' 54" 108° 13' 18"	209 KM	336.1KM	62.0°
236 95.1 mHz	Co-Channel	KTIT LICENSE	C3	YUMA	AZ	32° 42' 42" 114° 38' 58"	237 KM	406.0 KM	225.5°
236 95.1 mHz	Co-Channel	KTIT CP	C	YUMA	AZ	32° 40' 25" 114° 20' 12"	290 KM	389.1 KM	222.1°
237 95.3 mHz	+200 kHz	KKRK LICENSE	A	DOUGLAS	AZ	31° 22' 08" 109° 31' 45"	165 KM	471.1 KM	156.9°
237 95.3 mHz	+200 kHz	KNUW CP MOD	C1	CENTRAL	NM	32° 51' 47" 108° 14' 28"	209 KM	403.6 KM	131.6°
238 95.5 mHz	+400 kHz	KYOT LICENSE	C	PHOENIX	AZ	33° 20' 06" 112° 03' 39"	105 KM	221.2 KM	193.2°
238 95.5 mHz	+400 kHz	KWNR LICENSE	C	HENDERSON	NV	36° 00' 31" 115° 00' 22"	105 KM	326.5 KM	284.4°
239 95.7 mHz	+600 kHz	KQZE CP	C	ST. JOHNS	AZ	34° 15' 06" 109° 35' 06"	105 KM	210.0 KM	122.8°
239 95.7 mHz	+600 kHz	KQZE APP	C	ST. JOHNS	AZ	34° 15' 06" 109° 35' 06"	105 KM	210.0 KM	122.8°
239 95.7 mHz	+600 kHz	KPCL LICENSE	C1	FARMINGTON	NM	36° 41' 44" 108° 13' 11"	105 KM	336.1 KM	62.1°
289 105.7 mHz	+10.6 mHz	KVRD LICENSE	A	COTTONWOOD	AZ	34° 41' 15" 112° 07' 02"	29 KM	85.5 KM	220.1°
289 105.7 mHz	+10.6 mHz	KVRD APP	C3	COTTONWOOD	AZ	34° 41' 15" 112° 07' 02"	31 KM	85.5 KM	220.1°
290 105.9 mHz	+10.8 mHz	KXLL CP MOD	A	PARADISE VALLEY	AZ	33° 32' 30" 111° 57' 12"	29 KM	196.6 KM	191.9°
290 105.9 mHz	+10.8 mHz	KXLL APP	C3	PARADISE VALLEY	AZ	33° 32' 30" 111° 57' 12"	32 KM	196.6 KM	191.9°
290 105.9 mHz	+10.8 mHz	KRCY LICENSE	C1	KINGMAN	AZ	35° 01' 58" 114° 21' 57"	41 KM	261.2 KM	264.0°

**MINIMUM REQUIRED SPACING PURSUANT TO FCC RULE 73.207, TABLE "A".

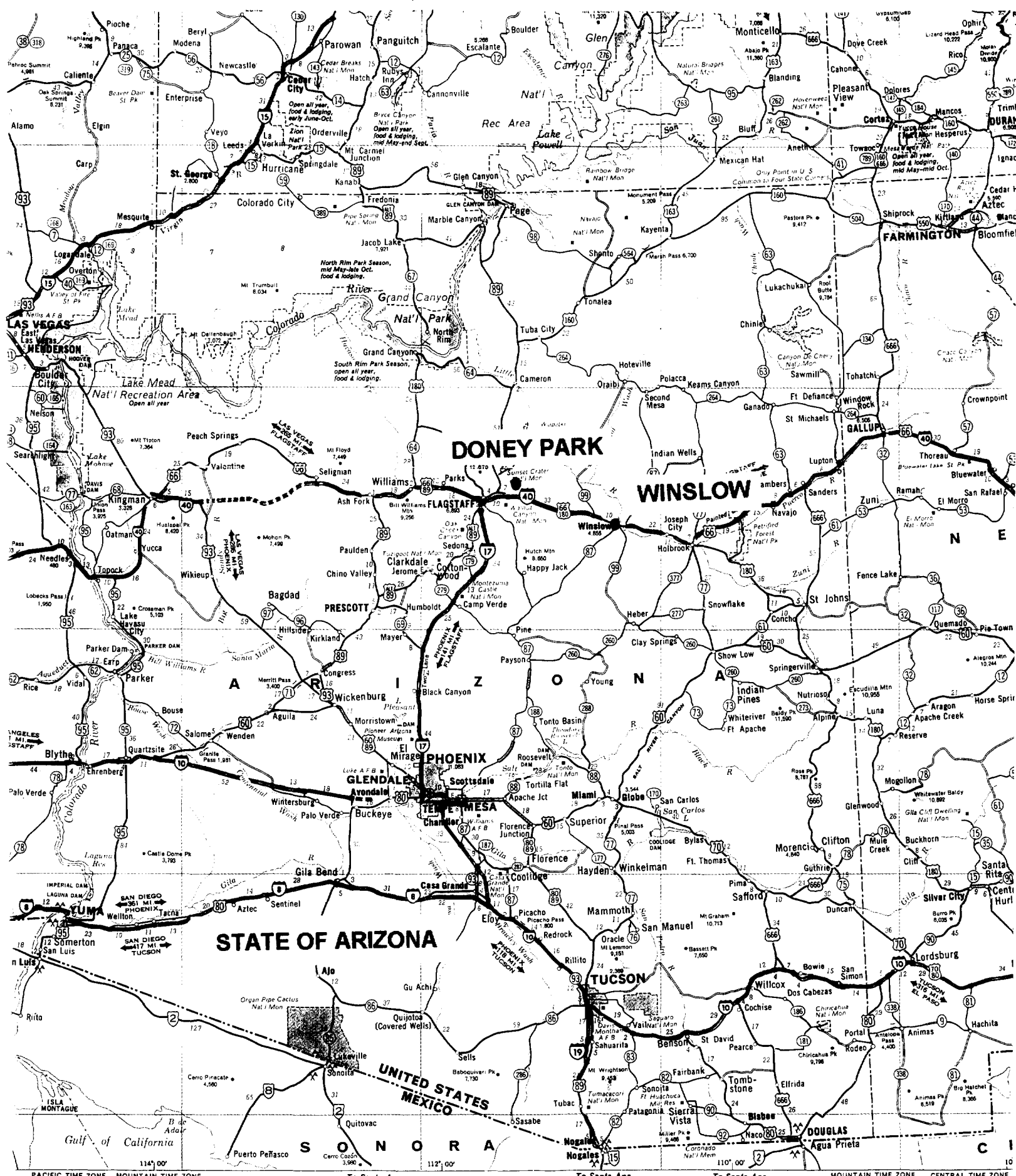
PREPARED BY: W.E. RAABE 10-27-95

DISTANCES FROM PROPOSED FREQUENCY ALLOCATION AT WINSLOW, ARIZONA
CHANNEL 292 - 106.3 MHZ - CLASS C2
REFERENCE POINT @ 35° 01' 43" N., 110° 41' 40" W. (CENTER OF WINSLOW, AZ.)

CHANNEL # FREQUENCY	CHANNEL SEPARATION	STATION STATUS	STATION CLASS	CITY OF LICENSE	STATE	N. LATITUDE W. LONGITUDE	** REQUIRED SPACING (KM)	DISTANCE TO STATION (KM)	AZIMUTH (DEGREES)
238 95.5 mHz	-10.8 mHz	KYOT LICENSE	C	PHOENIX	AZ	33° 20' 06" 112° 03' 39"	35 KM	226.1 KM	213.8°
239 95.7 mHz	-10.6 mHz	KQZE CP	C	ST. JOHNS	AZ	34° 15' 06" 109° 35' 06"	35 KM	133.3 KM	130.3°
289 105.7 mHz	-600 kHz	KVRD LICENSE	A	COTTONWOOD	AZ	34° 41' 15" 112° 07' 02"	55 KM	135.4 KM	253.8°
289 105.7 mHz	-600 kHz	KVRD APP.	C3	COTTONWOOD	AZ	34° 41' 15" 112° 07' 02"	56 KM	135.4 KM	253.8°
289 105.7 mHz	-600 kHz	KRBO LICENSE	C2	LAS VEGAS	NV	36° 20' 00" 115° 21' 41"	58 KM	446.4 KM	288.9°
290 105.9 mHz	-400 kHz	KRCY LICENSE	C1	KINGMAN	AZ	35° 01' 58" 114° 21' 57"	79 KM	335.0 KM	270.1°
290 105.9 mHz	-400 kHz	KXLL CP	A	PARADISE VALLEY	AZ	33° 32' 30" 111° 57' 12"	55 KM	201.5 KM	215.1°
290 105.9 mHz	-400 kHz	KXLL APP.	C3	PARADISE VALLEY	AZ	33° 32' 30" 111° 57' 12"	56 KM	201.5 KM	215.1°
291 106.1 mHz	-200 kHz	KKJI LICENSE	C2	GALLUP	NM	35° 29' 39" 108° 44' 32"	130 KM	185.0 KM	73.8°
291 106.1 mHz	-200 kHz	KIKO LICENSE	A	CLAYPOOL	AZ	33° 24' 23" 110° 48' 18"	106 KM	180.1 KM	183.2°
292 106.3 mHz	Co-Channel	KEDJ LICENSE	A	SUN CITY	AZ	33° 36' 05" 112° 17' 31"	166 KM	216.0 KM	222.9°
292 106.3 mHz	Co-Channel	KEDJ APP.	C2	SUN CITY	AZ	33° 48' 46" 112° 28' 58"	190 KM	212.5 KM	230.7°
292 106.3 mHz	Co-Channel	KONZ LICENSE	A	ARIZONA CITY	AZ	32° 37' 43" 111° 34' 09"	166 KM	278.1 KM	196.9°
293 106.5 mHz	+200 kHz	APP	A	ARIZONA CITY	AZ	32° 50' 04" 111° 38' 15"	106 KM	258.4 KM	199.7°
293 106.5 mHz	+200 kHz	KSNE LICENSE	C	LAS VEGAS	NV	36° 00' 30" 115° 00' 20"	188 KM	405.8 KM	285.5°
294 106.7 mHz	+400 kHz	KPPV LICENSE	C2	PRESCOTT VALLEY	AZ	34° 29' 25" 112° 32' 00"	58 KM	178.6 KM	250.5°
294 106.7 mHz	+400 kHz	KKGL CP	C1	PINETOP	AZ	34° 12' 20" 109° 56' 26"	79 KM	114.4 KM	142.8°
295 106.9 mHz	+600 kHz	KMJK LICENSE	A	BUCKEYE	AZ	33° 27' 01" 112° 35' 58"	55 KM	247.8 KM	225.1°
295 106.9 mHz	+600 kHz	KMJK APP	C2	BUCKEYE	AZ	33° 27' 01" 112° 35' 58"	58 KM	247.8 KM	225.1°

** MINIMUM REQUIRED SPACING PURSUANT TO FCC RULE PART 73.207, TABLE "A".

PREPARED BY: W.E. RAABE 10-27-95



DONEY PARK

WINSLOW

STATE OF ARIZONA

**UNITED STATES
MEXICO**

SONORA

PACIFIC TIME ZONE MOUNTAIN TIME ZONE To Santa Ana To Santa Ana To Santa Ana MOUNTAIN TIME ZONE CENTRAL TIME ZONE